

Message

From: Kovner, Karissa [Kovner.Karissa@epa.gov]
Sent: 11/4/2020 7:34:14 PM
To: Siciliano, CarolAnn [Siciliano.CarolAnn@epa.gov]
Subject: RE: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

It sure is.

From: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>
Sent: Wednesday, November 4, 2020 2:33 PM
To: Kovner, Karissa <Kovner.Karissa@epa.gov>
Subject: RE: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

(Otherwise, it's insubordination.... !)

Carol Ann Siciliano
Director and Associate Assistant Administrator
Office of Program Support
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Office & Mobile: (202) 564-5489
Siciliano.carolann@epa.gov

From: Kovner, Karissa <Kovner.Karissa@epa.gov>
Sent: Wednesday, November 4, 2020 2:32 PM
To: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>
Subject: RE: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

Thank you and you are a kind soul with your assumptions.

From: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>
Sent: Wednesday, November 4, 2020 2:22 PM
To: Kovner, Karissa <Kovner.Karissa@epa.gov>
Subject: RE: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

OPPT General just ended. OECD did not come up. Therefore, I think we should assume that Tala will proceed as instructed.

Carol Ann Siciliano
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From: Kovner, Karissa <Kovner.Karissa@epa.gov>
Sent: Wednesday, November 4, 2020 1:37 PM

To: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>

Subject: RE: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

Understand.

From: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>

Sent: Wednesday, November 4, 2020 1:36 PM

To: Kovner, Karissa <Kovner.Karissa@epa.gov>

Subject: RE: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

(I'm in a bubble, so no thanks!)

Carol Ann Siciliano

Director and Associate Assistant Administrator

Office of Program Support

Office of Chemical Safety and Pollution Prevention

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Siciliano.carolann@epa.gov

From: Kovner, Karissa <Kovner.Karissa@epa.gov>

Sent: Wednesday, November 4, 2020 1:36 PM

To: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>

Subject: RE: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

Thank you so much. Do you need an election update or are you watching?

From: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>

Sent: Wednesday, November 4, 2020 1:35 PM

To: Kovner, Karissa <Kovner.Karissa@epa.gov>

Subject: RE: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

Perfect. I'm on the OPPT call now. I don't see it on their agenda, but I'll be alert for "add on's"

Carol Ann Siciliano

Director and Associate Assistant Administrator

Office of Program Support

Office of Chemical Safety and Pollution Prevention

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Siciliano.carolann@epa.gov

From: Kovner, Karissa <Kovner.Karissa@epa.gov>

Sent: Tuesday, November 3, 2020 8:48 PM

To: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>

Subject: Re: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

I wrote the points intentionally to be VERY light on trade. These have been massaged by OPP to add in their points on USMCA, etc. Sorry the formatting is funky from my phone.

TALKING POINTS/KEY MESSAGES:

- ☐ The United States is pleased that this review is taking place and we look forward to staying actively engaged. We also recently expressed our desires for Mexico to increase its transparency, predictability, and consistency of its pesticide management regime.
- ☐ While we understand that there are shared competencies for pesticide management within the structure of the Mexican Government, our own U.S. Government experience, as well as that of our industries, has highlighted a need to address perceived frustrations and potential negative economic impacts due to delays in pesticide registrations and the perceived policy shift away from Mexico's traditional risk-based approach to pesticide management.
- ☐ These issues are of significant concern to us. We therefore welcome the opportunity to provide information from our stakeholders, along with our own examples and recommendations, to the Secretariat during this review.
- ☐ We would also appreciate learning more about Mexico's areas of concern that it is hoping will be addressed.

Additionally, the United States believes that consideration should be given to include the United States-Mexico-Canada Agreement (USMCA) Trilateral Technical Working Group on Pesticides to participate in this initiative.

Best,
Karissa
EPA mobile: (202)365-7838

On Nov 3, 2020, at 8:25 PM, Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov> wrote:

I think I've got it. Can you put into this email the exact Talking Points at issue. Your reply email will be my resource for tomorrow.

Carol Ann Siciliano
Director and Associate Assistant Administrator
Office of Program Support
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Office & Mobile: (202) 564-5489
Siciliano.carolann@epa.gov

From: Kovner, Karissa <Kovner.Karissa@epa.gov>
Sent: Tuesday, November 3, 2020 8:25 PM
To: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>
Subject: RE: US Position Paper for OECD JM Item 7: Review of the Regulation of Pesticides in MEX

Let me know if it isn't obvious what's happening ... Alex said she wanted the TRADE talking points, not just the REVIEW talking points, in the paper for Tala to deliver. Tala does not want to deliver the trade talking points (for reasons that make no sense). So despite what Alex said, Tala's still trying to get OPP to agree with her, which they do not—they are just willing to defer to her because she has her hackles raised. I believe she will try to convince Alex tomorrow that it's not the right forum to raise trade issues. But it is exactly the right forum: (1) the E in OECD is economic, (2) we would be passing up a huge opportunity to call attention to our USG concerns and Alex would like foolish to her counterparts in USDA, USTR and State, and (3) the best outcome of all would be for us to raise the issues and for the OECD Secretariat to join us or even get out in front of us in highlighting the problems Mexico has so we are not alone in our accusations.

Let me know if you want to talk by phone about this.

From: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>
Sent: Tuesday, November 3, 2020 8:11 PM
To: Kovner, Karissa <Kovner.Karissa@epa.gov>
Subject: RE: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

It's 1:30 pm to 2:30 pm tomorrow (Wed.). I'll attend.

Carol Ann Siciliano
Director and Associate Assistant Administrator
Office of Program Support
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Siciliano.carolann@epa.gov

From: Kovner, Karissa <Kovner.Karissa@epa.gov>
Sent: Tuesday, November 3, 2020 8:10 PM
To: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>
Subject: RE: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

Thanks. If you can check your schedule to see when the OPPT General is, it might be important for you to attend/call in to deal with this issue – or at least protect Alex from a challenge from them. Will you let me know when it is, please?

From: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>
Sent: Tuesday, November 3, 2020 8:08 PM
To: Kovner, Karissa <Kovner.Karissa@epa.gov>
Subject: RE: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

Thank you. Please let me know if you'd like me to engage.

Carol Ann Siciliano
Director and Associate Assistant Administrator
Office of Program Support
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Office & Mobile: (202) 564-5489
Siciliano.carolann@epa.gov

From: Kovner, Karissa <Kovner.Karissa@epa.gov>
Sent: Tuesday, November 3, 2020 12:53 PM
To: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>
Subject: Fwd: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

FYEO. We can discuss if you would like — but I think Michael's message, which he coordinated with me in advance, will be enough to let OPPT know that it is standing alone in contradiction to Alex's position.

Best,
Karissa
EPA mobile: (202)365-7838

Begin forwarded message:

From: "Goodis, Michael" <Goodis.Michael@epa.gov>
Date: November 3, 2020 at 11:01:37 AM EST
To: "Henry, Tala" <Henry.Tala@epa.gov>, "Kovner, Karissa" <Kovner.Karissa@epa.gov>, "Hall, Wanda" <Hall.Wanda@epa.gov>
Cc: "Barkas, Jessica" <barkas.jessica@epa.gov>, "Messina, Edward" <Messina.Edward@epa.gov>, "Chang, Elle" <chang.elle@epa.gov>, "Mosby, Jackie" <Mosby.Jackie@epa.gov>, "Picone, Kaitlin" <Picone.Kaitlin@epa.gov>, "Siciliano, CarolAnn" <Siciliano.CarolAnn@epa.gov>, "Collazo Reyes, Yvette" <CollazoReyes.Yvette@epa.gov>
Subject: RE: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

Attached is the paper that was provided earlier that includes the TPs that Karissa provided regarding concerns about delayed registrations and the perceived policy shift away from a risk-based approach, rather than the TPs being provided in an Annex.

I am not directly in the loop in all of the conversations with this topic, but my understanding is that Alex is asking and there was agreement to deliver these TPs during the OECD joint meeting. I also understand that there is concern in making these points during this venue. While EPA has been voicing its concerns about Mex's pesticide management approach, I am not familiar with the types of messages that are to be presented at the joint meeting. It seems to me that if there are still questions/concerns about whether or not these TPs should be raised at the joint meeting, then perhaps they should be elevated to the OCSPP IO.

Michael L. Goodis, P.E.
Acting Deputy Director for Programs
Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.
703-308-8157

From: Henry, Tala <Henry.Tala@epa.gov>
Sent: Tuesday, November 03, 2020 7:17 AM
To: Kovner, Karissa <Kovner.Karissa@epa.gov>; Hall, Wanda <Hall.Wanda@epa.gov>

Cc: Barkas, Jessica <barkas.jessica@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Chang, Elle <chang.elle@epa.gov>; Mosby, Jackie <Mosby.Jackie@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>
Subject: RE: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

We have only one paper.

Tala R. Henry, Ph.D.
Deputy Director
Office of Pollution Prevention & Toxics

T: 202-564-2959
E: henry.tala@epa.gov

From: Kovner, Karissa <Kovner.Karissa@epa.gov>
Sent: Tuesday, November 3, 2020 6:56 AM
To: Hall, Wanda <Hall.Wanda@epa.gov>
Cc: Henry, Tala <Henry.Tala@epa.gov>; Barkas, Jessica <barkas.jessica@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Chang, Elle <chang.elle@epa.gov>; Mosby, Jackie <Mosby.Jackie@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>
Subject: Re: US Position Paper for OECD JM Item 7:Review of the Regulation of Pesticides in MEX

Hi,

I'm not sure what that means, but just want to make sure that Tala has the points that Alex wants the USG to make, which includes the trade points. There shouldn't be two versions — just the final. If there's a problem getting that to Jessica, please let me know and Kaitlin or I can help. I'd like to confirm that Tala has the points she needs in one final version, without annexes, etc. (which can be annoying/hard to manage in the course of a meeting).

Thanks so much,

Best,
Karissa
EPA mobile: (202)365-7838

On Nov 3, 2020, at 6:41 AM, Hall, Wanda <Hall.Wanda@epa.gov> wrote:

Dear Karissa,

Everyone has both copies (the final version and the revised version). It's not clear to me what other changes are to be made. If you have any questions about the position paper and what version Tala will be using, you need to talk with her about it.

Regards,
Wanda

Wanda Hall
USG National Coordinator for OECD Test Guidelines Programme
Secretariat NAFTA TWG on Pesticides for OPP
US EPA/OCSPP/OPP/FEAD | 1200 Pennsylvania Ave, NW
(7506P) | Washington, DC 20460
Office Tel: 703-347-0448 | Mobile: 571-447-8017 | Email:
hall.wanda@epa.gov

Courier Address:

Potomac Yards South | 2777 Crystal Drive (Room 7723) | Arlington,
VA 22202

From: Kovner, Karissa <Kovner.Karissa@epa.gov>
Sent: Monday, November 02, 2020 8:33 PM
To: Hall, Wanda <Hall.Wanda@epa.gov>
Subject: Fwd: US Position Paper for OECD JM Item 7: Review of the
Regulation of Pesticides in MEX

Just confirming this got done and it's clear to Jessica what needed to
happen? Any problems?

Best,
Karissa
EPA mobile: (202)365-7838

Begin forwarded message:

From: "Kovner, Karissa" <Kovner.Karissa@epa.gov>
Date: November 1, 2020 at 11:11:58 PM EST
To: "Hall, Wanda" <Hall.Wanda@epa.gov>
Cc: "Chang, Elle" <chang.elle@epa.gov>, "Messina,
Edward" <Messina.Edward@epa.gov>, "Goodis,
Michael" <Goodis.Michael@epa.gov>, "Mosby, Jackie"
<Mosby.Jackie@epa.gov>, "Barkas, Jessica"
<barkas.jessica@epa.gov>
Subject: Re: US Position Paper for OECD JM Item
7: Review of the Regulation of Pesticides in MEX

Hi Wanda,

Nice to catch up a little the other day!

Sorry I haven't gotten to this formally until tonight, but
as we discussed, would you please work with Jessica to
re-insert the original talking points, position, and
background into the position paper for the OECD JM per

Alex's views from the Thursday meeting with her?
Thanks!

Best,
Karissa
EPA mobile: (202)365-7838

On Oct 27, 2020, at 3:44 PM, Hall,
Wanda <Hall.Wanda@epa.gov> wrote:

Dear Karissa and Elle,

I wanted to thank you for your input regarding the US position concerning the OECD WGP initiative to review the regulations of pesticides in Mexico. Tala thought the OECD JM is not the proper forum to raise potential trade conflict concerns and the focus should be concentrated on support for the review. Ed and Mike are in agreement with Tala's evaluation. Instead, we've included the trade concerns in an annex at the end of the position paper.

With regards,
Wanda

Wanda Hall
USG National Coordinator for OECD
Test Guidelines Programme
Secretariat NAFTA TWG on Pesticides
for OPP
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<Item 7-Review of the Regulation of
Pesticides in Mexico_US Position
Paper_10-27-2020_revised.docx>